

EXHIBIT 1

**Plaintiffs' More Definite Statement as to Defendant
Saudi Hollandi Bank**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC), including all of the allegations and claims contained therein.

Organizational Structure and Purpose of Saudi Hollandi Bank

2. Saudi Hollandi Bank, the first bank in the Kingdom of Saudi Arabia, was founded in 1926 as the Netherlands Trading Society.

3. Saudi Hollandi Bank is headquartered in Riyadh, Saudi Arabia with regional offices in Jeddah and Al-Khobar and has relationships with 500 banks in 52 countries.

4. Saudi Hollandi Bank is the largest non-Saudi owned bank in Saudi Arabia.

5. Saudi Hollandi Bank has 40 branch offices in the Kingdom of Saudi Arabia.

6. Saudi Hollandi Bank is a joint venture bank, owned 60% by Saudi nationals, and 40% by ABN AMRO , the largest bank in the Netherlands.

7. The Saudi Hollandi Bank is the main banker to the bin Laden family and the Saudi Binladin Group.

8. Saudi Hollandi Bank has a correspondent banking relationship with Al Shamal Islamic Bank.

9. Al Shamal Islamic Bank was involved in funding Osama Bin Laden terrorist activities.

10. A 1996 U.S. State Department report on Osama bin Laden's finances demonstrates that Osama bin Laden co-founded Al Shamal Islamic Bank with a group of wealthy Sudanese and capitalized it with \$50 million of his inherited fortune.

11. Al Shamal Islamic Bank enabled Osama bin Laden to move money quickly from one country to another through its correspondent relationships with some of the world's major banks, several of which have been suspended since the September 11th attacks on the United States.

12. Al Shamal Islamic Bank was founded and controlled by Saudi individuals and entities, in connection with Sudan's Hassan Al Turabi.

13. In the 1986 elections, Turabi led a new faction of the Muslim Brotherhood, the National Islamic Front (NIF).

14. When Hassan Al Turabi took power in 1989, Sudan became an operational base for international Islamic terrorism groups, as reported by the State Department annual "Patterns of Global Terrorism" for 1991

15. In 1991, Osama Bin Laden settled in Sudan where he was invited by Hassan Al Turabi and the Sudanese government.

16. Osama Bin Laden's close relationship with the new regime became "symbiotic" and he conducted several business projects with or on behalf of the NIF.

17. The Al Bir Organization (Benevolence International Foundation – BIF- holding charity) is shareholder of Al Shamal Islamic Bank bank.

18. SDGT Adel Abdul Jalil Batterjee, Chairman of Al Bir and founder of BIF, is Chairman of Al Shamal Islamic Bank.

19. Saudi Hollandi facilitated al-Qaida funding in Europe.

20. Saudi Hollandi Bank held accounts of Defendant al-Waqf al-Islami organization.

21. The Al Qaeda militants suspected to be behind the 9/11 attacks had attended sermons in the Al-Furquan mosque in Eindhoven. The training sessions are conducted by the al-Waqf al-Islami organization, funded by wealthy Saudis.

22. Since the '80s, al-Waqf al-Islami sermons have drilled extremist messages into the heads of thousands of Muslim youth from across Europe.

23. The sermons inspired the six Al Qaeda operatives to plot the 9/11 terrorist attack on the World Trade Center.